

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ELAINE M. DECOULOS,

Plaintiff,

v.

BRUNO LIONEL SCHRODER, SUZANNE
MALTZAHN, ASSOCIATED NEWSPAPERS
LTD., SOLO SYNDICATION, LTD., THE
SCOTSMAN PUBLICATIONS, LTD., CENGAGE
LEARNING, INC., THE GALE GROUP, INC.,
HIGHBEAM RESEARCH, INC.,

Defendants.

Civil Action
No. 1:11-cv-10972-DPW

DECLARATION OF JOHN E. DEWICK

1. I am a partner of the firm Arrowood Peters LLP, which represents defendants Cengage Learning, Inc., The Gale Group, Inc. and HighBeam Research, Inc. (the latter of which is incorrectly named as a defendant) ("Cengage Defendants"). I make this declaration in support of the Cengage Defendant's motion in opposition to plaintiff's request for entry of default and motion for relief from the November 16, 2012 order. I have personal knowledge of the facts stated herein.

2. On January 17, 2013, Arrowood Peter's offices received an envelope with papers that included a document with this action's caption entitled "Plaintiff's Further Motion for Relief from Order Made on November 16, 2012 [81] for More time to Oppose Defendants' Motions to Dismiss [29], [39], [49], [53] [] [sic] and to Request Default and to Seal this Motion for its Health Contents." The envelope containing this motion was postmarked on January 14, 2013. I have not annexed a copy of said motion to this declaration because plaintiff seeks to "seal the motion for its health contents."

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: January 23, 2013

/s/ John E. DeWick

John E. DeWick

CERTIFICATE OF SERVICE

I, John (Jed) DeWick, Esq., hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on this 23rd day of January 2013.

/s/ John DeWick
John (Jed) DeWick, Esq.